

BLANK ROME, LLP
Attorneys for Plaintiffs
ALLIED MARITIME INC. and
MARITIMA ALLIED PTE LTD.
Thomas H. Belknap, Jr. (TB-3188)
The Chrysler Building
405 Lexington Ave.
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALLIED MARITIME INC. and
MARITIMA ALLIED PTE LTD.,

Plaintiffs,

-against-

MILAN NIGERIA LTD.,

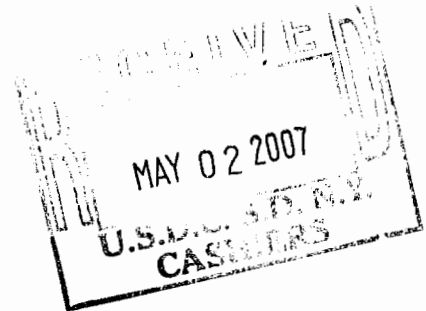
Defendant.

07 Civ.

VERIFIED COMPLAINT

JUDGE CASTEL

07 CV 3522



Plaintiffs, ALLIED MARITIME INC. and MARITIMA ALLIED PTE LTD.
("Plaintiffs"), by their attorneys Blank Rome, LLP, complaining of the above-named Defendant,
MILAN NIGERIA LTD. ("Defendant"), alleges upon information and belief as follows:

1. This is a case of admiralty and maritime jurisdiction, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. The Court has admiralty jurisdiction under 28 U.S.C. §1333.

2. At all material times, Plaintiff ALLIED MARITIME INC. was and now is a foreign corporation with its address at 80 Broad Street, Monrovia, Liberia, and Plaintiff MARITIMA ALLIED PTE LTD. was and now is a foreign corporation with its address at 21-03A Singapore Land Tower, 50 Raffles Place, Singapore 048623.

3. At all material times, Defendant was and is a foreign corporation or other business entity with its offices at 52A Kofo Abayomi Street, Victoria Island, Lagos, Nigeria and no place of business in the United States.

4. By a charter party dated on or about April 19, 2005, ("the Charter"), Plaintiff ALLIED MARITIME INC. chartered the M/V MARILIA to defendant for one voyage from "Kohsichang" to "1 safe berth Lagos and 1 safe berth Port Harcourt."

5. By charter party dated on or about April 27, 2005, Plaintiff MARITIMA ALLIED PTE LTD chartered the M/V LAND to Defendant for one voyage from "Kandia" to "1 safe berth Lagos and 1 safe berth Port Harcourt."

6. In breach of each of these charters, Defendant wrongfully failed to pay outstanding amounts due to Plaintiffs as demurrage incurred in respect of the referenced vessels. Specifically, Defendant owes demurrage of \$297,254.60 in respect of the M/V MARILIA and \$884,231.25 in respect of the M/V LAND, no part of which has been paid although the time for payment has passed and payment has been duly demanded.

7. Each charter provides for arbitration of disputes in London pursuant to English law, and Plaintiffs reserves their right to arbitrate the disputes pursuant to 9 U.S.C. § 8.

8. Maritime arbitrators in London routinely award interest, legal fees and arbitral costs to a successful party. Plaintiffs estimate recoverable interest will amount to at least \$283,556, calculated at a rate of 8% per year for at least 3 years and recoverable legal fees and costs (including arbitrators' fees) will be at least US\$425,000, amounting in all to recoverable interest and expenses of at least US\$708,556.

9. The total amount of Plaintiffs' claims for which they request issuance of Process of Maritime Attachment and Garnishment is **US\$1,890,041.85.**

10. Defendant cannot be found within this district within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, but Defendant is believed to have or will have during the pendency of this action, assets within this district consisting of cash, funds, freight and/or hire credits in the hands of garnishees in this District, including but not limited to electronic fund transfers.

WHEREFORE, Plaintiffs pray:

A. That process in due form of law issue against the Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Complaint;

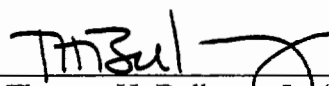
B. That since the Defendant cannot be found within this District pursuant to Rule B of the Supplemental Rules for Admiralty and Maritime Claims, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, attaching all of Defendant's tangible or intangible property or any other funds held by any garnishee in the district which are due and owing or otherwise the property of to the Defendant up to the amount of US\$1,890,041.85 to secure the Plaintiffs' claims, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged in the Complaint;

C. That this Court enter judgment for Plaintiffs' damages plus interest and costs, or retain jurisdiction over this matter through the entry of a judgment on an arbitration award.

D. That Plaintiffs may have such other, further and different relief as may be just and proper.

Dated: New York, NY
May 2, 2007

Respectfully submitted,
BLANK ROME, LLP
Attorneys for Plaintiffs
ALLIED MARITIME INC. and
MARITIMA ALLIED PTE LTD.

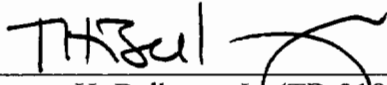
By 
Thomas H. Belknap, Jr. (TB-3188)
405 Lexington Ave.
New York, NY 10174-0208
(212) 885-5000

VERIFICATION

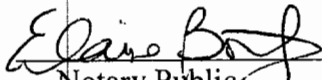
STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

Thomas H. Belknap, Jr., being duly sworn, deposes and says:

1. I am a member of the bar of this Honorable Court and of the firm of Blank Rome LLP, attorneys for the Plaintiff.
2. I have read the foregoing Complaint and I believe the contents thereof are true.
3. The reason this Verification is made by deponent and not by Plaintiffs is that Plaintiffs are foreign corporations, no officer or director of which are within this jurisdiction.
4. The sources of my information and belief are documents provided to me and statements made to me by representatives of the Plaintiffs.


Thomas H. Belknap, Jr. (TB-3188)

Sworn to before me this
2nd day of May 2007


Notary Public

ELAINE BONOWITZ
Notary Public, State of New York
No. 43-4893320
Qualified in Richmond County
Certificate Filed in New York County
Commission Expires May 11, 2007

BLANK ROME, LLP
Attorneys for Plaintiffs
ALLIED MARITIME INC. and
MARITIMA ALLIED PTE LTD.
Thomas H. Belknap, Jr. (TB-3188)
The Chrysler Building
405 Lexington Ave.
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALLIED MARITIME INC. and
MARITIMA ALLIED PTE LTD.,

Plaintiffs,

-against-

MILAN NIGERIA LTD.,

Defendant.

07 Civ.

**AFFIDAVIT UNDER
SUPPLEMENTAL RULE B**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

THOMAS H. BELKNAP, JR., being duly sworn, deposes and says:

1. I am a member of the Bar of this Honorable Court and a member of the firm of Blank Rome, LLP, attorneys for the Plaintiffs herein. I am familiar with the circumstances of the complaint and submit this affidavit in support of Plaintiffs' request for the issuance of process of maritime attachment and garnishment of the property of defendant, ("Defendant"), a foreign corporation, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

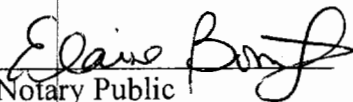
2. Defendant is a party to a maritime contract of charter party and is a foreign corporation with offices in Lagos, Nigeria and no offices or place of business within this judicial district.

3. Under my supervision, my office did a search of the New York State Secretary of State, Division of Corporations, the Transportation Tickler, telephone assistance, and a general internet search.

4. In our search, we did not find any listing or reference to Defendant in this judicial district or the state of New York. In the circumstances, I believe Defendant cannot be found within this district.


THOMAS H. BELKNAP, JR.

Sworn to before me this
2nd day May, 2007


Notary Public

ELAINE BONOWITZ
Notary Public, State of New York
No. 43-4893320
Qualified in Richmond County
Certificate Filed in New York County
Commission Expires May 11, 20 07